



Republic of the Philippines
Anti-Money Laundering Council
Bangko Sentral ng Pilipinas Complex
Manila, Philippines

RESOLUTION NO. 05
Series of 2016

In the Memorandum dated 15 January 2016, the AMLC Secretariat (AMLCS) reported to the Council that:

Bulk Reporting of Multiple Suspicious Transactions

Resolution No. 43, Series of 2014, authorizes covered persons to submit fifty (50) or more suspicious transactions under one Suspicious Transaction Report STR. The authority was based on the impracticality of requiring covered persons to file STRs on each of these transactions. A case in point is when an investment scam breaks out where it is impractical for covered persons to report suspicious transactions on a daily basis.

The guidelines in Resolution No. 43, Series of 2014, require that the reportable transactions should involve the same suspicious transaction indicator, and refer to the same accountholder and account number. The guidelines also provide that the transaction details shall be included as part of the narrative (not to exceed 4,000 characters) or can be extracted as an Excel file and submitted to the AMLC as an STR attachment.

The guidelines, however, do not prescribe a standard reporting format. As a result, covered persons file the corresponding STRs in a variety of forms. The STRs that are not in the standard format could not be uploaded to the database, resulting in the difficulty of analyzing them and comparing them with related transactions in the database. Thus there is a need to revisit the guidelines.

Bulk Reporting of Multiple Fraud-Related Suspicious Transactions

The Council also receives from banks STRs relative to fraudulent transactions (fraud-related transactions) arising from:

- 1. Use of skimmed, stolen or lost credit and ATM cards;*
- 2. Mail order/telephone orders;*
- 3. Unauthorized withdrawals;*

4. Point of sale-Debit; and
5. Spurious checks.

In fraud-related transactions, the victims are different account holders and the perpetrators are unknown. Yet, the filing of STRs is warranted by the fact that they are related to an unlawful activity pursuant to Section 3(b-1)(6) of the Anti-Money Laundering Act of 2001 (AMLA), as amended.

The filing of STR on each of the fraud-related transactions is impractical because of their volume. But unlike the bulk suspicious transactions described in Resolution No. 43, Series of 2014, the fraud-related transactions involve different accounts of different account owners. Thus the reporting thereof is not covered by the said Resolution.

Consultation:

The AMLC Secretariat held a consultation with the stakeholders on the reporting format under Resolution No. 43, Series of 2014. A similar consultation was held on the issue of bulk reporting of fraud-related transactions under one STR.

It was agreed that the reporting format under Resolution No. 43, Series of 2014 be streamlined along with the formulation of a reporting format for fraud-related transactions involving different account holders as victims. It was likewise agreed that in both formats, the number of reportable transactions under one STR shall be at least five (5) suspicious transactions.

The Council resolved to:

1. Amend Resolution No. 43, Series of 2014 by:
 - i. Reducing the number of reportable bulk suspicious transactions from fifty (50) or more to at least five (5) suspicious transactions;
 - ii. Adopting a standard reporting format for the aforementioned transactions– using Format B1 (**Annex A** hereof).
2. Require covered persons to report, using Format B2 (**Annex B** hereof), for fraud-related transactions involving different account holders.
3. Adopt the following guidelines for Format B1 and B2:
 - i. In both formats, the first row should contain all details/fields common to all transactions, and the

- succeeding rows should contain the details of the transactions;
- ii. The filename format should follow the convention of a regular STR;
 - iii. Files should be saved as CSV and be encrypted;
 - iv. The STR should be uploaded in the AMLC portal like a regular STR;
 - v. For Format B2, transactions should be limited to those with Transaction Codes where the mandatory party is the account holder and the subject of suspicion is unknown; and
 - vi. In all cases, covered persons have the option to file STR on each suspicious transaction, or in bulk pursuant to the herein guidelines.

4. Request the Bangko Sentral ng Pilipinas, the Securities and Exchange Commission and Insurance Commission, to disseminate copies of this Resolution to covered persons under their supervisory authority.

20 January 2016, Manila, Philippines.

(Sgd.) **AMANDO M. TETANGCO, JR.**
Chairman
(Governor, Bangko Sentral ng Pilipinas)

(Sgd.) **TERESITA J. HERBOSA**
Member
(Chairperson, Securities and Exchange Commission)

(Sgd.) **EMMANUEL F. DOOC**
Member
(Commissioner, Insurance Commission)

ANNEX A

Bulk Reporting under AMLC Resolution 43 Series of 2014 (B1)

FIRST ROW

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
A1	Format Code	Text	2	X(2)	B1
B1	Submission Type	Text	1	X(1)	A- add, E- edit, D- delete, T-test
C1	Report Date	Number	8	9(8)	YYYYMMDD
D1	Account Number	Text	40	X(40)	
	Name	Text			
E1	Last Name		30	X(30)	Last name of account holder
F1	First Name		30	X(30)	First name of account holder
G1	Middle Name		30	X(30)	Middle name of account holder
	Address				
H1	Address1		50	X(50)	Room No./Office Name, Bldg./ House No., Street, Subd./ Brgy.
I1	Address2		50	X(50)	District, Town, City
J1	Address3		30	X(30)	Province, Country code, ZIP
K1	Birthdate/Registration Date	Number	8	9(8)	YYYYMMDD
L1	Place of Birth/Registration	Text	90	X(90)	City, Municipality, Country
M1	Nationality	Text	40	X(40)	
N1	ID Type	Text	4	X(4)	ID1 – Passport ID2 – Driver’s License ID3 – PRC ID ID4 – NBI Clearance ID5 – Police Clearance ID6 – Postal ID ID7 – Voter’s ID ID8 – TIN ID9 – Barangay Certification ID10 – GSIS e-Card/UMID ID11- SSS ID12 – Senior Citizen Card ID13 – Overseas Workers Welfare Administration (OWWA) ID ID14 – OFW ID ID15 – Seaman’s Book ID16 – Alien/Immigrant Certification of Registration ID17 – Gov’t Office/GOCC ID ID18 – Certification from National Council for the Welfare of Disabled Persons(NCWDP) ID19 – Department of Social Welfare and Development (DSWD) Certification ID20 – Integrated Bar of the Philippines (IBP) ID ID21–Company ID ID22– Student’s ID ID23 – National ID ID24 - SEC Certificate of Registration ID25 – Business Registration Certificate
O1	Identification No.	Text	30	X(30)	
P1	Nature of Business	Text	35	X(35)	
Q1	Reason	Memo	800		Reason for Suspicion SI1- There is no underlying legal or trade obligation, purpose or economic justification. SI2- The client is not properly identified. SI3- The amount involved is not commensurate

with the business or financial capacity of the client.

SI4- The transaction is structured to avoid being reported.

SI5- There is a deviation from the client's profile/past transactions.

SI6- The transaction is similar, analogous or identical to any of the foregoing. (Additional reason is required after a semicolon ie. SI6;The client is.....)

PC1- Kidnapping for ransom

PC2- Drug trafficking and related offenses

PC3- Graft and corrupt practices

PC4- Plunder

PC5- Robbery and Extortion

PC6- Jueteng and Masiao

PC7- Piracy on the high seas

PC8- Qualified Theft

PC9- Swindling

PC10- Smuggling

PC11- Violations under the Electronic Commerce Act of 2000

PC12- Hijacking; destructive arson; and murder, including those perpetrated by terrorists against non-combatant persons and similar targets

PC13 – Terrorism and conspiracy to commit terrorism

PC14 – Financing of Terrorism

PC15 – Bribery

PC16 – Frauds and Illegal Exactions and Transactions

PC17 – Malversation of Public Funds and Property

PC18 – Forgeries and Counterfeiting

PC19 – Violations of Sections 4 to 6 of the Anti-Trafficking in Persons Act of 2003

PC20 – Violations of Sections 78 to 79 of the Revised Forestry Code of the Phils., as amended

PC21 – Violations of Sections 86 to 106 of the Fisheries Code of 1998

PC22 – Violations of Sections 101 to 107 and 110 of the Philippine Mining Act of 1995

PC23 – Violations of Section 27 (c), (e), (f), (g) and (i) of the Wildlife Resources Conservation and Protection Act

PC24 – Violation of Section 7b of the National Caves and Cave Resources Management Protection Act

PC25 – Violation of the Anti-Carnapping Act of 2002

PC26 – Violations of Sections 1,3 and 5 of the Decree Codifying the Laws on Illegal/Unlawful Possession Manufacture Dealing In, Acquisition or Disposition of Firearms, Ammunition or Explosives

PC27 – Violation of Anti-Fencing Law

PC28 – Violation of Section 6 of the Migrant Workers and Overseas Filipinos Act of 1995

PC29- Violation of Intellectual Property Code

					PC30 – Violation of Section 4 of the Anti-Photo and Video Voyeurism Act of 2009 PC31 – Violation of Section 4 of the Anti-Child Pornography Act of 2009 PC32 – Violations of R.A. No. 7610, Special Protection of Children Against Abuse, Exploitation and Discrimination PC33 - Fraudulent practices and other violations under the Securities Regulation Code of 2000 PC34 - Felonies or offenses of a similar nature that are punishable under the penal laws of other countries.
R1	Narrative	Memo	4000		Narrative of events leading to Suspicion

ALL FIELDS UNDER ROW 1 ARE MANDATORY EXCEPT FOR THE MIDDLE NAME WHICH IS OPTIONAL

Details of the transactions (Starting at row 2)

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
*A	Party type Flag of Subject (Name indicated in Row1)	Text	1	X	A – Account Holder; B – Beneficiary; C- Counterpart (<i>pls refer to the AMLC Reporting Procedures Manual for a complete list</i>)
*B	Institution Code	Number	11	9(11)	As provided by AMLC (Institution code of the branch where the transaction took place)
*C	Transaction Date	Number	8	9(8)	YYYYMMDD
*D	Transaction Code	Text	5	X(5)	AMLC Transaction Codes
*E	Transaction Reference No.	Text	20	X(20)	must be unique per tran date
*F	Transaction Amount (Php)	Number	20	9(18).99	Greater than 0 w/ or w/o decimal value
G	Transaction Amount (FX)	Number	17	9(15).99	Optional
H	FX Currency Code	Text	3	X(3)	optional; mandatory if fx amount <> null
I	Name of Correspondent Bank	Text	90	X(90)	
J	Address1		50	X(50)	Room No./Office Name, Bldg./ House No., Street, Subd./ Brgy.
K	Address2		50	X(50)	District, Town, City
L	Address3		30	X(30)	Province, Country code, ZIP
M	Country Code of Correspondent Bank	Number	3	9(3)	Country Code (Please refer to system codes in the AMLC Reporting Procedures Manual)

- ALL FIELDS MARKED WITH ASTERISK ARE MANDATORY
- FOR REMITTANCE TRANSACTIONS, NAME, ADDRESS AND COUNTRY CODE OF CORRESPONDENT BANK WILL BE MANDATORY

For transactions involving multiple parties continue with Columns N,O,P,.....

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
*N	Party Type Flag	Text	1	X	A – Account Holder; B – Beneficiary; C- Counterpart (<i>pls refer to the AMLC Reporting Procedures Manual for a complete list</i>)
	Name	Text			
*O	Last Name		30	X(30)	Last name of account holder
*P	First Name		30	X(30)	First name of account holder
Q	Middle Name		30	X(30)	Middle name of account holder
	Address				
R	Address1		50	X(50)	Room No./Office Name, Bldg./ House No., Street, Subd./ Brgy.
S	Address2		50	X(50)	District, Town, City
T	Address3		30	X(30)	Province, Country code, ZIP
U	Birthdate/Registration Date	Number	8	9(8)	YYYYMMDD
V	Account Number	Text	40	X(40)	

- ALL FIELDS MARKED WITH ASTERISK ARE MANDATORY

Bulk Reporting Electronic Record Format (B2)

FIRST ROW

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
*A1	Format Code	Text	2	X(2)	B2
*B1	Submission Type	Text	1	X(1)	A- add, E- edit, D- delete, T-test
*C1	Report Date	Number	8	9(8)	YYYYMMDD
*D1	Reason	Memo	800		Reason for Suspicion SI1- There is no underlying legal or trade obligation, purpose or economic justification. SI2- The client is not properly identified. SI3- The amount involved is not commensurate with the business or financial capacity of the client. SI4- The transaction is structured to avoid being reported. SI5- There is a deviation from the client's profile/past transactions. SI6- The transaction is similar, analogous or identical to any of the foregoing. (Additional reason is required after a semicolon ie. SI6;The client is.....) PC1- Kidnapping for ransom PC2- Drug trafficking and related offenses PC3- Graft and corrupt practices PC4- Plunder PC5- Robbery and Extortion PC6- Jueteng and Masiao PC7- Piracy on the high seas PC8- Qualified Theft PC9- Swindling PC10- Smuggling PC11- Violations under the Electronic Commerce Act of 2000 PC12- Hijacking; destructive arson; and murder, including those perpetrated by terrorists against non-combatant persons and similar targets PC13 – Terrorism and conspiracy to commit terrorism PC14 – Financing of Terrorism PC15 – Bribery PC16 – Frauds and Illegal Exactions and Transactions PC17 – Malversation of Public Funds and Property PC18 – Forgeries and Counterfeiting PC19 – Violations of Sections 4 to 6 of the Anti-Trafficking in Persons Act of 2003 PC20 – Violations of Sections 78 to 79 of the Revised Forestry Code of the Phils., as amended PC21 – Violations of Sections 86 to 106 of the Fisheries Code of 1998 PC22 – Violations of Sections 101 to 107 and 110

					<p>of the Philippine Mining Act of 1995</p> <p>PC23 – Violations of Section 27 (c), (e), (f), (g) and (i) of the Wildlife Resources Conservation and Protection Act</p> <p>PC24 – Violation of Section 7b of the National Caves and Cave Resources Management Protection Act</p> <p>PC25 – Violation of the Anti-Carnapping Act of 2002</p> <p>PC26 – Violations of Sections 1,3 and 5 of the Decree Codifying the Laws on Illegal/Unlawful Possession Manufacture Dealing In, Acquisition or Disposition of Firearms, Ammunition or Explosives</p> <p>PC27 – Violation of Anti-Fencing Law</p> <p>PC28 – Violation of Section 6 of the Migrant Workers and Overseas Filipinos Act of 1995</p> <p>PC29- Violation of Intellectual Property Code</p> <p>PC30 – Violation of Section 4 of the Anti-Photo and Video Voyeurism Act of 2009</p> <p>PC31 – Violation of Section 4 of the Anti-Child Pornography Act of 2009</p> <p>PC32 – Violations of R.A. No. 7610, Special Protection of Children Against Abuse, Exploitation and Discrimination</p> <p>PC33 - Fraudulent practices and other violations under the Securities Regulation Code of 2000</p> <p>PC34 - Felonies or offenses of a similar nature that are punishable under the penal laws of other countries.</p>
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	Address				
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M	Address2		50	X(50)	District, Town, City
N	Address3		30	X(30)	Province, Country code, ZIP
O	Birthdate	Number	8	9(8)	YYYYMMDD

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